

EXHIBIT A

From: Hibbler, Leah <lhibbler@paulweiss.com>
Sent: Thursday, June 5, 2025 2:20 PM
To: Thorne, John
Cc: jrhee@dirllp.com; Maier, Eric J.; Jessica Phillips; Erica Spevack
Subject: [EXTERNAL] RE: United States et al. v. Google LLC - Case No. 1:23-cv-00108 (EDVA)

John,

Thank you for taking the time to meet and confer with us yesterday about Mr. Wheatland's deposition.

We are happy to change the place and time of the deposition to accommodate Mr. Wheatland's location and availability. We will change the location as requested to New York, and we will schedule the deposition for the date you proposed, June 24. We will send an updated subpoena shortly reflecting both changes.

Google does not agree to the two constraints you proposed imposing on Mr. Wheatland's deposition. You asked that we agree to limit the duration of the deposition to 3.5 hours. As we indicated during the call, we anticipate being efficient with Mr. Wheatland's time and not rehash his prior depositions, but we cannot commit in advance to a shorter deposition than the 7 hours provided for in FRCP 30(d)(1).

You also requested that Google commit in advance to not ask any questions asked in Mr. Wheatland's previous depositions or about the Daily Mail's claims against Google in other cases. Google's examination of Mr. Wheatland will focus on remedies topics relevant to the current phase of this case, not on duplicating material covered in other depositions or digging into claims in other cases, but we cannot agree to impose limits on what Google may ask about during that examination.

Best,

Leah

Leah R. Hibbler | Associate
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Pronouns: She/Her

From: Hibbler, Leah
Sent: Wednesday, June 4, 2025 1:08 PM
To: Thorne, John <jthorne@kellogghansen.com>
Cc: Spevack, Erica <espevack@paulweiss.com>; jrhee@dirllp.com; Maier, Eric J. <emaier@kellogghansen.com>; Jessica Phillips <jphillips@dirllp.com>
Subject: RE: United States et al. v. Google LLC - Case No. 1:23-cv-00108 (EDVA)

Hi John,

Thank you for accepting service. We can be available at 5pm ET, if that works for you.

Best,

Leah

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From: Thorne, John <jthorne@kellogghansen.com>
Sent: Wednesday, June 4, 2025 12:09 PM
To: Hibbler, Leah <lhobbler@paulweiss.com>
Cc: Spevack, Erica <espevack@paulweiss.com>; jrhee@dirllp.com; Maier, Eric J. <emaier@kellogghansen.com>
Subject: RE: United States et al. v. Google LLC - Case No. 1:23-cv-00108 (EDVA)

Leah, Erica, Jeannie: We will accept service of the subpoena to Matt Wheatland. I need to discuss with you the schedule, location, and scope of the deposition. Can someone on your team be available to discuss later today? I'm available at 4 pm or later. Best regards, JT

John Thorne
KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.
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From: Hibbler, Leah <lhobbler@paulweiss.com>
Sent: Monday, June 2, 2025 8:08 PM
To: Thorne, John <jthorne@kellogghansen.com>
Cc: Spevack, Erica <espevack@paulweiss.com>
Subject: [EXTERNAL] United States et al. v. Google LLC - Case No. 1:23-cv-00108 (EDVA)

Counsel,

Please see the attached subpoena for the deposition of Matthew Wheatland. Please confirm whether you will accept service by email.

Best,

Leah

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